

EXHIBIT 28

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*Attorneys for Irving H. Picard, Esq., as Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE ASSOCIATES;

LILLIAN M. SAGE, IN HER CAPACITY AS PARTNER
OR JOINT VENTURER OF SAGE ASSOCIATES AND
INDIVIDUALLY AS BENEFICIARY OF SAGE

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04362 (SMB)

ASSOCIATES;

MALCOLM H. SAGE, IN HIS CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE
ASSOCIATES, INDIVIDUALLY AS BENEFICIARY OF
SAGE ASSOCIATES, AND AS THE PERSONAL
REPRESENTATIVE OF THE ESTATE OF LILLIAN M.
SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS PARTNER
OR JOINT VENTURER OF SAGE ASSOCIATES AND
INDIVIDUALLY AS BENEFICIARY OF SAGE
ASSOCIATES;
AND

ANN M. SAGE PASSER, IN HER CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE
ASSOCIATES AND INDIVIDUALLY AS
BENEFICIARY OF SAGE ASSOCIATES,

Defendants.

THIRD AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the October 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were served by: December 21, 2015.
2. Fact Discovery shall be completed by: January 31, 2018
3. The Disclosure of Case-in-Chief Experts shall be due: May 9, 2018
4. The Disclosure of Rebuttal Experts shall be due: July 18, 2018
5. The Deadline for Completion of Expert Discovery shall be: August 29, 2018
6. The Deadline for Service of a Notice of Mediation Referral shall be: September 12, 2018
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: September 26, 2018.

8. The Deadline for Conclusion of Mediation shall be: January 16, 2019.

Dated: September 28, 2017
New York, New York

By: /s/ Heather J. McDonald
David J. Sheehan
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Nicholas J. Cremona
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Heather J. McDonald
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L. Madoff Investment Securities LLC and Estate of
Bernard L. Madoff*

/s/ Andrew B. Kratenstein
Consented To:

Andrew B. Kratenstein

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IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE REALTY;

LILLIAN M. SAGE, IN HER CAPACITY AS PARTNER
OR JOINT VENTURER OF SAGE REALTY AND
INDIVIDUALLY AS BENEFICIARY OF SAGE

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04400 (SMB)

REALTY;

MALCOLM H. SAGE, IN HIS CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE REALTY,
INDIVIDUALLY AS BENEFICIARY OF SAGE
REALTY, AND AS THE PERSONAL
REPRESENTATIVE OF THE ESTATE OF LILLIAN M.
SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS PARTNER
OR JOINT VENTURER OF SAGE REALTY AND
INDIVIDUALLY AS BENEFICIARY OF SAGE
REALTY;
AND

ANN M. SAGE PASSER, IN HER CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE REALTY
AND INDIVIDUALLY AS BENEFICIARY OF SAGE
REALTY,

Defendants.

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